



15 October 2020

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for Submissions – Application A1191: Mono- and diglycerides of fatty acids (INS 471) as glazing agent for fruits and vegetables*.

Yours sincerely

  
**Chief Executive**



**Call for Submissions – Application A1191:  
Mono- and diglycerides of fatty acids  
(INS 471) as glazing agent for fruits and  
vegetables**

**Submission by the New Zealand Food & Grocery  
Council**

**15 October 2020**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1191: Mono- and diglycerides of fatty acids (INS 471) as glazing agent for fruits and vegetables*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

### THE APPLICATION

3. Apeel Sciences (Calif, USA) has sought to extend the use of the currently permitted food additive, mono- and diglycerides of fatty acids (INS 471) as a glazing agent for fresh fruits and vegetables in the Australia New Zealand Food Standards Code (the Food Standards Code). This additive is already permitted in the Food Standards Code used at Good Manufacturing Practice (GMP) but it does not have permission for the proposed purpose of use as a glazing agent for fresh fruit and vegetables.

### OVERARCHING COMMENTS

4. NZFGC is fully supportive of the proposed amendments to the Food Standards Code to permit INS 471 to have its application extended to include fresh fruit and vegetables. However, we make the following points in the current environment:
  - we note that the additive is already permitted in the Food Standards Code and the application is for an extension of the permission of an additive assessed as safe
  - use is voluntary and contribution to the diet is extremely low
  - if the FSANZ Act permitted it (which it does not), FSANZ might have considered it timely to also add in a concurrent amendment to the Food Standards Code for INS 471 to be applied to nuts and seeds for the same purpose
  - the OBPR has provided a blanket exemption for the conduct of a cost benefit analysis yet the FSANZ Act still requires FSANZ to conduct one.
5. These points highlight the waste of resources that the current regulatory system constraints apply to FSANZ/Government, industry and consumers and is a clear example of the need for amendment of the Act and a review of the regulatory system.

### Detailed Comments

6. Edible films and coatings on fresh produce have been around for nearly a century. They have been used by commercial growers to prevent loss of moisture and to create a shiny fruit surface for aesthetic purposes. However, not all fresh produce is capable of withstanding the harsh process by which waxes or resins have historically been a feature of application. This is not the case with INS 471. These coatings can be applied to a wider range of produce using tailored application processes now available commercially.
7. FSANZ conducted a risk and technical assessment which concluded that it was safe (as had been the conclusion internationally of JECFA and the Codex Alimentarius in the General Standard for Food Additives), that performed the technological function of a

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glazing agent. Even if used widely on fruit and vegetables in Australia and New Zealand, INS471 would only contribute 0.6-0.8% of mean total fat intake across the population.

8. Internationally the additive is approved for use on fresh fruit and vegetables in Japan, Mexico, Peru, USA, and the EU.
9. Besides the benefit to industry noted in paragraph 8 above, significantly, edible glazing products generally and INS471 in particular, provide a safe means of extending and preserving products to limit food wastage and plastics use (as an alternative preservation means) and so contribute positively to the environment.
10. There is a trade benefit as well not included in the Call for Submissions which is relevant to both Australia and New Zealand. Our fresh produce exports, entering many markets in the Northern hemisphere off season, will benefit from the inclusion of INS 471 not only in terms of competitive advantage for produce from similar off-season exporting nations but also to ensure preservation is maximised for the distance travelled to market of Australia and New Zealand produce.
11. The labelling required (in the ingredients listing of packaged food) is no different to that of many other food additives.
12. NZFGC supports the draft amendments to the Food Standards Code to extend the application of INS 471 to fresh produce. We would note that if the FSANZ Act permitted it (which it does not), FSANZ might have considered it timely to also add in an amendment to the Food Standards Code for INS 471 to be applied to nuts and seeds for the same purpose.